From: (b) (6)
Sent: Monday, August 29, 2016 10:30 PM
To: HarborComments
Subject: Portland Harbor Superfund Site

Portland has the country's biggest Superfund site. The Willamette River is contaminated from more than a century of industrial use with over 100 toxic and dangerous chemicals, compounds, and toxic substances that threaten human, plant, and animal life.

The paltry amount of $746 million dollars won't come close to fixing the problem and making the river safe again. We need to do more:

• We must remove as much contaminated sediment as possible from this area, beyond what is required in Alternative G of the Feasibility Study.

• We must limit the amount of Monitored Natural Recovery throughout the site.

• We must have fish that are safe to consume, without raising cancer risk for people, when the cleanup is complete.

• We must utilize capping technology, where clean materials are put over contaminated sediments to hold them in place only where it is technically feasible, and where it will never impede navigation. We must also realize that capping has costs for the long-term with perpetual monitoring that adds to the cost of such measures.

• We must ensure that when sediment is removed from the river in this area, that it is disposed of safely.

• We must also ensure that polluters pay for their full share of the Cleanup.

Also:

Adopt Alternative G with enhancements to improve the long-term effectiveness of the cleanup.

Select disposal options that do not include a Confined Disposal Facility and that do include treatment of dredged sediment to breakdown or bind contaminants.

Because Institutional Controls (IC) are not effective, especially in the long term, EPA needs to reduce the need for ICs, and include in the ROD provisions for PRPs covering the costs of ICs, and provisions for evaluating the IC effectiveness with regular program modifications.

Monitored Natural Recovery (MNR), with or without enhancement has not been shown to be effective and therefore EPA needs to reduce the use of MNR, enhance the monitoring to annually, and include provisions in the R.O.D. for contingency actions if monitoring data indicate unsatisfactory performance results.

Accept the new technology options that will reduce costs and improve long term effectiveness. These may be conducted as pilot projects.

Include atmospheric transport in analysis of exposures. This inclusion will indicate the extent to which remaining contamination will expose humans in the community to unacceptable risks.

Require the state of Oregon to continue upland sources control via legally enforceable means; the current text indicates that this approach “May” be taken.

The EPA needs to require installation of environmental and quality of life monitoring during the construction phase, with the PRP’s covering the cost. This provision needs to be a required element and clearly stated.

The Community needs regular opportunities for input during the construction phase of the cleanup. The general goals and design characteristics/requirements of the fish tissue monitoring need to be specifically listed in the R.O.D.

Habitat restoration following remedy construction needs to be a required element in the R.O.D. Aquatic habitat that is disturbed by the remedy must be restored and the full cost paid by the PRPs. When nearshore and intertidal habitat has to be removed, it must be replaced and replanted with SAV that thrives.

This remedy will have features that must be maintained in perpetuity and thus analyses need to account for a longer time frame in estimating costs and benefits.

The community expects the final remedy to comply with state environmental quality, especially the water quality criteria for the PTW contaminants. PCBs, dioxins and DDTs in water and fish must meet state water quality standards.

When the data are obtained for the remedial design, these must be shared with the community.

This site presents characteristics of an Environmental Justice community, yet EPA has not addressed this issue. EPA needs to assess the EJ aspects of this site and take appropriate action to enhance protective and remedial measures.

The final result of the cleanup should be the lifting of the Fish Consumption Advisory related to PCBs for the Portland Harbor area by a specific date.

The US EPA should lead the cleanup effort after the ROD, not the State of Oregon.
Sediment should be removed from the Swan Island area rather than implementing a massive input of carbon as a treatment.

Thank you,

(b) (6)
Portland, OR 97219